

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

CHARITY CHIDINMA
EMERONYE SWIFT,

Plaintiff,

V.

FRONTIER AIRLINES, INC., et. al.

Defendants.

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) Case No: **1:14-CV-001139**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT’S MOTION TO DISMISS**

Plaintiff Charity Chidinma Emeronye Swift, through undersigned counsel, moves this Honorable Court for an extension of time to respond to the Defendant's Motion to Dismiss Counts III & IV of Plaintiff's Complaint and in support thereof states as follows:

1. Plaintiff filed her Complaint in this matter on September 4, 2014, and the Defendant was timely served with a copy of the Complaint on September 17, 2014.

2. On October 8, 2014, Defendant moved the Court for an extension of time to Answer the Complaint. The Court granted that Motion in an Order dated October 10, 2014.

3. On October 22, 2014, Defendant filed its Motion to Dismiss Counts III & IV of Plaintiff's Complaint under Fed. R. Civ. P. 12(b)(6) claiming Plaintiff failed to adequately plead a claim for either intentional infliction of emotional distress or defamation. The deadline for Plaintiff to file her *pro se* reply memorandum to Defendant's Motion to Dismiss is November 5, 2014.

4. Plaintiff recently retained Coleman Law Group as counsel to represent her in this cause. Given this development, and to ensure counsel adequately responds to the significant issues raised in Defendant's Motion to Dismiss, a two-week extension of time to file a memorandum in response to Defendant's Motion to Dismiss is respectfully requested.

5. On October 30, 2014, Plaintiff's counsel contacted Defendant's counsel to request consent to this Motion. Defendant does not object to this Motion or to the requested relief sought herein.

6. A Fed. R. Civ. P. 16 pretrial scheduling conference is not yet scheduled.

7. A proposed Order is being filed with this Motion.

WHEREFORE, for the foregoing reasons and for good cause shown, Plaintiff respectfully requests that the Court grant this Motion and issue an Order extending its time to respond to the Complaint up to and including November 20, 2014.

Respectfully submitted,

By: /s/
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Counsel for Charity Swift

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of November 2014, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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_____/s/_____
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